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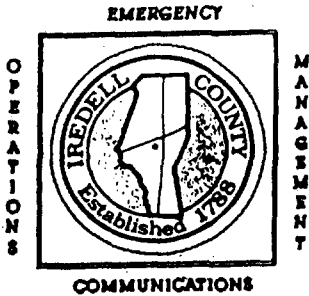
IREDELL COUNTY

Emergency

Communications, Operations & Management

P.O. Box 788

Statesville, North Carolina 28687



Before the
Federal Communications Commission
Washington, D.C.

In the Matter of:

Replacement of Part 90 by)
Part 88 to Revise the Private) PR Docket 92-235
Land Mobile Radio Services and)
Modify the Policies Governing Them)

To: The Commission

COMMENTS OF: William L. Dickerson, Director
Iredell County Emergency Communications
Statesville, North Carolina

PR Docket 92-235 proposes many changes in current regulations that will be detrimental to Public Safety.

Many of the changes proposed by the Commission involve the 150-174MHz band. This is the primary operating band for every fire department, rescue squad, and emergency medical services unit that operate in our jurisdiction. Reduction of available frequencies, reduced power, limited antenna height and effective radiated power will only serve to cripple mobile communications or at best cause Iredell County to expend hundreds of thousands of dollars in new sites and equipment.

Prohibiting or making frequency pairs difficult to obtain for mobile relay in this spectrum is further adding insult to injury.

Our local requirements are for wide area coverage. We simply have insufficient equipment or transmissions sites to do the job now. There are no funding provisions or incentives that I can determine in PR 92-235 to assist local governments in defraying the costs that will be involved in implementation.

Migration time frames also appear unreasonable and costly, as well as unclear.

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I respectfully disagree with members of your staff on many of the areas of spectrum "refarming". They have received some bad advice and as such are giving you some bad advice in the form of PR 92-235.

I would urge the Commission to exempt Public Safety from all changes in PR 92-235 that are applicable to public safety spectrum, specifically 150-174MHz. Further, I would urge the Commission to adopt a "hands off" policy as deals with allowances placing any but public safety agencies in this spectrum. Any spectrum reallocation or other changes in rules must be beneficial and cost effective to public safety. Our communications systems in public safety are the lifeline in helping to save lives, and protect property.

Respectfully submitted this the 18th day of March, 1993



Wm. L. Dickerson, Director
Iredell County Emergency Communications